

# **EXHIBIT 1**

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

1:22-cv-10904-JSR

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 SATURDAY, JUNE 10, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 [REDACTED]

20 - - -

21 Videotaped deposition of James E.  
22 Staley, held at the offices of Boies Schiller  
23 Flexner, LLC, 55 Hudson Yards, New York, New  
24 York, commencing at 9:13 a.m. Eastern, on the  
25 above date, before Carrie A. Campbell,  
Registered Diplomat Reporter and Certified  
Realtime Reporter.

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GOLKOW LITIGATION SERVICES  
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deps@golkow.com

1 A. Mid-'90s.

2 Q. And do you recall that Jeffrey  
3 Epstein served as Les Wexner's money manager?

4 A. I recall that Epstein was an  
5 advisor to Les Wexner. I don't know in what  
6 capacity.

7 Q. And do you know if Jamie Dimon  
8 and Les Wexner knew one another?

9 A. I imagine they did, yes.

10 Q. Have you ever met Les Wexner?

11 A. Yes.

12 Q. In what context?

13 A. Taking The Limited public.

14 Q. That was before Mr. Dimon  
15 joined the company, correct?

16 A. Yes.

17 Q. And when you took The Limited  
18 public in the mid-'90s, you hadn't met  
19 Jeffrey Epstein as part of that; is that  
20 fair?

21 A. My recollection is that's the  
22 first time that I met him.

23 Q. So you believe you met him at  
24 some point before Sandy Warner suggested that  
25 you have a meeting with him; is that correct?

1           A.       Very briefly, yes.

2           Q.       And that would have been in  
3       relation to taking The Limited public?

4           A.       I was visiting The Limited, and  
5       my recollection is Epstein had an office  
6       there, and I saw him for a couple minutes.

7           Q.       And is it fair at that time you  
8       would -- you didn't know who he was?

9           A.       No.

10          Q.       Why would you imagine that  
11       Jamie Dimon and Les Wexner knew one another?

12          A.       Both their involvements with  
13       Ohio.

14          Q.       What is Jamie Dimon's  
15       involvement with Ohio?

16          A.       I think he worked for the bank  
17       there.

18          Q.       Did you have occasion to meet  
19       with Les Wexner after 2000?

20          A.       Not that I recall.

21          Q.       I want to talk about Labe  
22       Jackson.

23                   Do you know who that is?

24          A.       Uh-huh, yes, I do.

25          Q.       And how do you know Labe

1 don't know.

2 Q. Irrespective of your  
3 involvement with his accounts, the fact that  
4 he had his accounts and the size of his  
5 accounts at JPMorgan benefitted JPMorgan.

6 You would agree, right?

7 A. I think no -- you know, I don't  
8 think any single client is that important,  
9 but he was a client of the bank.

10 Q. And he continued to refer  
11 clients to JPMorgan before, during and after  
12 his incarceration, correct?

13 MR. GAIL: Objection.

14 THE WITNESS: I don't think he  
15 referred clients to the bank. I met  
16 clients through him, but I don't think  
17 he was making a referral.

18 QUESTIONS BY MR. EDWARDS:

19 Q. Do you know who Thomas McGraw  
20 is?

21 A. No.

22 Q. Do you remember a Tom McGraw in  
23 the tax department of JPMorgan?

24 A. I don't.

25 Q. Did you ever become aware of

1 Q. Did you ever cooperate in any  
2 of the investigations, like voluntarily  
3 cooperate in any of the investigations, into  
4 Jeffrey Epstein?

5 A. No.

6 Q. Do you know whether JPMorgan  
7 cooperated in the Florida investigation,  
8 either on the state level or the federal  
9 level, in the 2006 to 2008 time frame?

10 A. I don't know.

11 Q. Were you ever asked whether  
12 JPMorgan should cooperate in that  
13 investigation?

14 A. Not that I recall.

15 Q. After Jeffrey Epstein was  
16 arrested, did you go visit him?

17 A. When?

18 Q. When he was arrested, sorry, in  
19 2019.

20 A. No, I did not.

21 Q. When was the last time you  
22 spoke with Jeffrey Epstein?

23 A. I want to say October,  
24 November 2015.

25 Q. Why was that the last time that

1       you spoke with Jeffrey Epstein?

2               A.       I became CEO of Barclays.

3               Q.       And what about your position as  
4       CEO of Barclays had anything to do with you  
5       no longer meeting with or communicating with  
6       Jeffrey Epstein?

7               A.       Being CEO of a major British  
8       bank is a very, very visible job, and I  
9       thought it was not appropriate to deal at all  
10      with Epstein in that role.

11              Q.       By that point in time, did you  
12      realize that Jeffrey Epstein had lied to you  
13      in the past about his lack of understanding  
14      of the ages of some of the victims that had  
15      accused him?

16              A.       Yes.

17              Q.       And did that have anything to  
18      do with your making a decision to stop  
19      talking with him?

20              A.       Yeah. I think it became  
21      increasingly that he had a very, very  
22      terrible past, and I didn't want to be  
23      associated with him.

24              Q.       When you were CEO of Barclays,  
25      did you remain in contact with Prince Andrew?